A 06/OPP#34136
SM

1401 Eye Street, N.W.
Suite 220
Washington, D.C. 20005
(202) 872-4688

VALENT®

5PP

June 20, 1995

Information for EFED LIST A
SUMMARY REPORT FOR NALED
CASE NO.: 0092 NALED
EPA CHEMICAL NO.: 034401
EPA COMPANY NO.: 59639

Ms. Brigid Lowery
U.S. Environmental Protection Agency
SRRD/Office of Pesticide Programs [H7508W]
Room 33G6, Crystal Station I
2800 Crystal Drive
Arlington, VA 22202

Dear Brigid,

As we discussed, Valent, SRRD and EFED will postpone the June 21, 1995 meeting to discuss the EFED List A Summary Report for the Naled rereregistration eligibility decision. We acknowledge that representatives of EFED require time to review and discuss issues outlined in Valent's June 9, 1995 submission. We appreciate the extra time taken by you and the scientists to review our comments and urge you to consider them carefully in light of the unusally short persistence of naled. We continue to feel strongly that many of the practices or policy defaults used by the EPA, both for toxicity testing, exposure and risk characterization, penalize compounds with very short half-lives much more than materials with a more conventional profile.

As I promised, enclosed please find an update to Table 1 that provides a complete listing of proposed use directions for naled.

Based on our telephone conversation, the nNaled RED Team has concluded the following:

1. Mysid Life Cycle (72-5) - This mysid study was reviewed by EPA on September 6, 1994 and deemed to be invalid due to reduced production of mysid offspring. Valent received a copy of the study's Data Evaluation Record in May, 1995.

   Valent Response - Valent believes the MATC presented in the submitted study is a scientifically valid, conservative value based upon repeated, extensive testing. We acknowledge the EPA's decision to require a new study and agree to submit a new study in eight months. We are confident that additional repeat studies will not produce a significantly different MATC and request that the EPA use the current data for risk assessment purposes.

(1)

2. **Avian Reproduction (71-4a,b)** - EPA scientists have considered the information provided in Valents April 1, 1993 submission and will expand the discussion in the RED . However, the RED will list that this data requirement has not been satisfied. EPA's concern as stated in the RED is "because the labels provide no restrictions on number of applicatons or application intervals there is a significant potential for continuous or repeated exposure of birds."

   Valent's Response- Valent disagrees with the EPA decision to require the study. We feel that an exception must be made for naled and encourage the EPA administrators to consider Valent's arguments. Specifically, agruments related to the proposed use directions in Table 1 and the use of EPA acceptable worst case crop residue decline data instead of the Kenaga nomogram. These data produce dramatically lower and more accurate terrestrial EEC's for naled, thereby eliminating potential concern regarding chronic risk to birds.

   If the EPA continues to require an Avian Reproduction study, Valent requests the opportunity to submit a response to EPA's review of a proposed study design which Valent submitted to your attention on November 11, 1992 (see memorandum dated December 22, 1992 from A. Maciorowski to B. Lowery, entitled "Response to Proposed Protocol Modifications for Avian Reproduction Studies with Naled"). Assuming Valent and EPA agree on the basic study design, Valent will submit the study within 18 months. Because Valent has demonstrated due diligence, acting in good faith all uses defined in Table 1 should be maintained pending a full review of the Avian Reproduction study results.

3. **Aquatic Plant Growth (122-2)** - The EPA agrees that the test solutions should be analyzed both before and after completion of the study, and that the EC_{50} should be determined based on the measured initial concentrations. The study results presented in the draft EFED RED will be reviewed by EPA scientists to ensure the conclusions are consistent with this position.

4. **Sheepshead Minnow Early Life Study (72-4)** - The EPA is reviewing the study based on information provided in the June 9, 1995 submission.

   The MATC presented in this study is a scientifically valid value based upon testing conducted with organisms which exhibited acceptable hatching, growth and survival. We therefore believe that this study should be upgraded and that it is useful for risk assessment purposes.

NALED (0092)
June 20, 1995

Table 1 Update: Summary of Proposed Naled Use Patterns

Crop	Max. Rate (lbs. ai/acre)	Maximum no. Of applications	Minimum spray interval (days)	Typical Application Method
Alfalfa Seed	1.35	3	7	air or ground
Almonds, Peaches	3.6	1	n/a	airblast
Citrus	1.8	3	7	airblast or ground boom
Cole Crops	1.8	5	7	air or ground
Cotton	0.9	5	7	air or ground
Grapes	0.9	6	7	airblast or ground boom
Safflower	0.675	3	7	air or ground
Beans, peas	1.35	3	7	air or ground
Celery	1.35	5	7	air or ground
Eggplant, peppers	1.8	3 @ 1.8 lbs. 6 @ 0.9 lb.	7	air or ground
Melons	1.8	1 @ 1.8 lbs. 2 @ 0.9 lb.	7	air or ground
Range (Hornflies)	0.4	5	7	air
Strawberries	0.9	5	7	ground boom
Sugarbeets	0.9	5	7	air or ground
Summer squash	1.8	3 @ 1.8 lbs. 6 @ 0.9 lb.	7	air or ground
Walnuts	1.8	2	7	air or ground

[Footnote: Mosquito/wide use patterns are carefully controlled by abatement agencies. Public health concerns preclude limits on maximum number of applications or minimum interval]

(4.)